

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

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ATTORNEYS FOR DEBTOR

In re:

LTL MANAGEMENT LLC,¹

Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Judge: Michael B. Kaplan

Objection Deadline: August 8, 2023

Hearing Date and Time:
August 22, 2023 at 10:00 a.m.

**NOTICE OF DEBTOR'S MOTION
FOR ENTRY OF ORDER (A) APPROVING FORM AND MANNER OF NOTICE OF
HEARING ON DISCLOSURE STATEMENT; (B) APPROVING DISCLOSURE
STATEMENT; (C) ESTABLISHING SOLICITATION AND TABULATION
PROCEDURES; (D) SCHEDULING A HEARING ON CONFIRMATION OF
AMENDED CHAPTER 11 PLAN AND APPROVING FORM AND
MANNER OF NOTICE THEREOF; AND (E) AND GRANTING RELATED RELIEF**

¹ The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

PLEASE TAKE NOTICE that, on August 22, 2023 at 10:00 a.m. (prevailing Eastern Time) or as soon thereafter as counsel may be heard, LTL Management LLC, the above-captioned debtor (the “Debtor”) by and through its counsel, shall move before the Honorable Michael B. Kaplan, United States Bankruptcy Judge, at the United States Bankruptcy Court, Clarkson S. Fisher U.S. Courthouse, 402 East State Street, Trenton, New Jersey 08608, for the entry of an order, substantially in the form submitted herewith (the “Solicitation Procedures Order”), pursuant to sections 105(a), 502, 1125, 1126, and 1128 of title 11 of the United States Code (the “Bankruptcy Code”), Rules 2002, 3003, 3016, 3017, 3018, 3020, 9006, and 9008 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Rules 3016-1, 3018-1, 9013-1, and 9013-2 of the Local Rules of the United States Bankruptcy Court for the District of New Jersey (the “Local Bankruptcy Rules”), approving: (i) the form and manner of the Disclosure Statement Notice; (ii) the Debtor’s Disclosure Statement as providing “adequate information” in accordance with section 1125 of the Bankruptcy Code and for purposes of solicitation of votes on the Plan; (iii) the Debtor’s proposed procedures for the solicitation and tabulation of votes on the Plan; (iv) the Debtor’s proposed procedures with respect to the hearing on confirmation of the Plan; and (v) related relief (the “Motion”).²

PLEASE TAKE FURTHER NOTICE that, responsive papers, if any, must be filed with the Clerk of the Bankruptcy Court, Clarkson S. Fisher Courthouse, 402 East State Street, Trenton, New Jersey 08608, and served upon (a) the Debtor’s undersigned counsel, (b) counsel to the Official Committee of Talc Claimants, (c) the Future Claimants’ Representative and her counsel, (d) counsel to the Ad Hoc Committee of Supporting Counsel and (e) the Office of the United States Trustee for the District of New Jersey.

² Capitalized terms used herein but not otherwise defined have the meanings given to them in the Motion.

PLEASE TAKE FURTHER NOTICE that, unless an objection is timely filed and served, the Motion will be deemed uncontested in accordance with D.N.J. LBR 9013-3(d) and the requested relief may be granted without a hearing.

Dated: July 11, 2023

WOLLMUTH MAHER & DEUTSCH LLP

/s/ Paul R. DeFilippo

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